## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Edward Komito,

Plaintiff,

v.

Civil Action No. 5:18-cv-02824-EGS

LexisNexis Risk Solutions Inc., et al.,

Defendants.

## DEFENDANTS' EXPEDITED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Defendants Reed Elsevier, Inc., RELX Group LLC and LexisNexis Risk Solutions Inc. (collectively, "Defendants"), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1), file this motion for a two-week extension of time, up to and including September 14, 2018, within which to file their response to Plaintiff's Motion for Preliminary Injunction filed by Plaintiff Edward Komito, and state as follows:

- 1. Defendants' response to the Motion for Preliminary Injunction was due to be filed on or before August 31, 2018.
- 2. Counsel for Defendants contacted Plaintiff to request a two-week extension, but Plaintiff declined to consent to such extension.
- 3. Counsel for Defendants continue to review the allegations in the Motion for Preliminary Injunction and conduct and analyze its research regarding the same.
  - 4. This is the first request by Defendants for an extension with respect to this matter.
- 5. No party will be prejudiced by this Court granting an extension, and this Motion is not being filed for purposes of harassment or delay.

6. A copy of a proposed order granting this extension is attached.

WHEREFORE, for the reasons stated above, Defendants respectfully request that their deadline to respond to Plaintiff's Motion for Preliminary Injunction be extended through September 14, 2018.

Dated: August 27, 2018 HANGLEY ARONCHICK SEGAL PUDLIN & SCHILLER

By: /s/ Sharon F. McKee

Sharon F. McKee (Pa. Bar No. 81499) Bonnie M. Hoffman (Pa. Bar No. 201140)

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Attorneys for Defendants

**CERTIFICATE OF SERVICE** 

I hereby certify that on the 27th day of August 2018, I electronically filed the foregoing

pleading with the Clerk of the Court using the CM/ECF System and that the pleading is available

for viewing and downloading from the CM/EFC System. Additionally, I certify that on August

27, 2018, the foregoing pleading was served via U.S. mail and email to the following:

Edward Komito 1326 Doe Trail Road Allentown, PA 18104

/s/ Sharon F. McKee

Sharon F. McKee